

## UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION  
United States District Court  
Southern District of Texas  
FILED

UNITED STATES OF AMERICA

V

JAN 29 2019

CRIMINAL COMPLAINT

DE LA ROSA, Veronica

CASE NUMBER: B-19-175 -MJ

A201 535 806

David J. Bradley, Clerk of Court

UNITED STATES

I, the undersigned being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 01/27/2019 in Cameron County, in the SOUTHERN District of TEXAS defendant, did,

knowing, willfully, and in violation of law did bring or attempt to bring into the United States one (1) undocumented alien knowing or in reckless disregard of the fact that such alien has not received prior authorization to come to, enter, or reside in the United States, engaged in a conspiracy to commit any of the preceding acts, and was done for the purpose of commercial advantage or private financial gain,

in violation of Title	<u>8</u>	United States Code, Section(s)	<u>1324(a)(1)(A)(ii)</u> ,
in violation of Title	<u>8</u>	United States Code, Section(s)	<u>1324(a)(1)(A)(v)(I)</u> ,
in violation of Title	<u>8</u>	United States Code, Section(s)	<u>1324(a)(2)(B)(ii)</u> .

I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

The defendant attempted to transport into the United States one undocumented alien in a vehicle through the Brownsville & Matamoros International Bridge in Brownsville, Texas. The defendant traveled to Matamoros, Tamaulipas Mexico from Houston, Texas, picked-up the alien in Matamoros, Tamaulipas Mexico, and transported her to the port of entry. While in secondary a search of the vehicle resulted in the discovery of one undocumented alien in the rear cargo area concealed underneath luggage, a comforter and chairs. In secondary, the alien was identified by Customs and Border Protection Officers as L.M.C. 24yoa a citizen and national of Mexico with no documents to enter or be in the United States. The defendant entered into a conspiracy with persons known and unknown to transport the undocumented alien into the United States in violation of law and was to receive \$4,000.00 US Dollars as payment for her efforts upon arrival in Houston, Texas.

Continued on the attached sheet and made a part hereof: Yes ☒ No

Rebecca Longoria CBPEO  
Signature of Complainant

Sworn to before me and subscribed in my presence,

January 29, 2019  
Date

at

Brownsville, Texas  
City and State

Ignacio Torteya III, U.S. MAGISTRATE JUDGE  
Name & Title of Judicial Officer

Signature of Judicial Officer